

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

Hon. Robert. B. Kugler

This Document Relates To:  
*All Actions*

Civ. No. 19-2875 (RBK/JS)

**PLAINTIFFS' SECOND AMENDED NOTICE OF VIDEOTAPED  
DEPOSITION TO KALPESH PATEL**

TO: **Alexis Brancato  
Brittney Nagle  
Kirkland & Ellis, LLP  
601 Lexington Avenue,  
New York, NY 10022**

*Counsel for Defendants Torrent Pharmaceuticals LTD and Torrent Pharma Inc.*

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Plaintiffs will take the videotaped deposition of Kalpesh Patel, General Manager – Quality Assurance. The deposition will commence on **Thursday, June 3, 2021, at 9:00 a.m. Eastern Standard Time**, and continue until completion, at Kirkland & Ellis, LLP, 601 Lexington Ave. New York, NY 10022, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632).

The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

This notice is amended to reflect the new deposition date.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

Jeff Gibson  
Wagner Reese, LLP  
201 N. Illinois St.  
16th Floor – South Tower  
Indianapolis, IN 46204  
(866) 389-1352

Ned McWilliams  
Levin, Papantonio, Thomas, Mitchell,  
Rafferty & Proctor, P.A.  
316 South Baylen St.  
Pensacola, FL 32502  
(850) 435-7138  
nmcwilliams@levinlaw.com

The deposition will be taken before an officer authorized to administer oaths. Testimony given during the deposition will be recorded by sound video recording and stenographic means.

DATED this 30<sup>th</sup> day of April, 2021.

**LAW OFFICES OF GEORGE A. BARTON, P.C.**

By: /s/ Stacy A. Burrows  
Stacy A. Burrows  
7227 Metcalf Ave. Ste. 301  
Overland Park, KS 66204  
Phone (913) 563-6253

*Attorneys for Plaintiffs*

**EXHIBIT A**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Kalpesh Patel.
2. The complete production of Kalpesh Patel's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

**CERTIFICATE OF SERVICE**

I, Stacy Burrows, hereby certify that on April 30, 2021, I caused true and correct copies of the foregoing to be transmitted via ECF to all counsel having registered an appearance on ECF, with courtesy copies served on counsel for Torrent Pharmaceuticals Limited and Torrent Pharma Inc., and Defendants' liaison counsel, via email.

DATED this 30<sup>th</sup> day of April, 2021.

**LAW OFFICES OF GEORGE A. BARTON, P.C.**

By: /s/ Stacy A. Burrows  
Stacy A. Burrows  
7227 Metcalf Ave. Ste. 301  
Overland Park, KS 66204  
Phone (913) 563-6253

***Attorneys for Plaintiffs***